

EXHIBIT D-4

EXHIBIT A

Brill Declaration Ex. B

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Curriculum Vitae of

WILLIAM KUNZMAN, TRAFFIC ENGINEER

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William Kunzman, P.E. has worked professionally in traffic engineering and transportation planning since 1968 in both the public and private sectors. He is an Expert Witness in Traffic Engineering involving highway accidents.

TECHNICAL EXPERTISE

Traffic engineer expert regarding motor vehicle accidents (automobile, truck, bus, pedestrian, bicycle, motorcycle).

Knowledge of governmental agency procedures, design, geometrics, signs, traffic controls, parking, and maintenance.

EDUCATION

Undergraduate Work: Bachelor of Science Degree in Engineering (1967), University of California at Los Angeles, School of Engineering (September, 1963 to June, 1967)

Post Graduate Work: One Year (10 classes) Certificate in Traffic Engineering (1968), Yale University, Bureau of Highway Traffic (September, 1967 to June, 1968)

Federal Highway Administration: 18 Month Highway Engineering Training Program, (1970)

Guest Lecturer: University of California at Irvine (1975)

Class Instructor: California State University at Fullerton (1976)

REGISTRATION

Registered Professional Traffic Engineer in the State of California, TE0056 since 1975.

WORK EXPERIENCE

1. County of Los Angeles, Assistant Traffic Engineer (1967)
2. Wilbur Smith and Associates, Assistant Traffic Engineer (1968)
3. Federal Highway Administration, Office of Policy Planning (1969 - 1972) Worked in Oregon, Illinois, Pennsylvania, and Washington, D.C. Prepared Highway Needs Study which was presented to Congress
4. County of Riverside, Assistant Traffic Engineer (1972 - 1973)
5. Lampman Associates, Traffic Engineer Associate (1973 - 1974)
6. City of Irvine, Transportation Planning Engineer (1974 - 1975)
7. Weston Pringle and Associates, Traffic Engineer Associate (1975 - 1976)
8. Self Employment (1976 to Present)

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HONORS AND AWARDS

1. Received fellowship and living stipend to attend Yale University from the Insurance Institute for Highway Safety, 1967-1968
2. Elected Class President of Yale University Bureau of Highway Traffic, 1967
3. Recipient of the 1978 Institute of Transportation Engineers Past Presidents' Award
4. Recipient of the 1979 Institute of Transportation Engineers, Southern California Section, Young Traffic Engineer of the Year Award

PROFESSIONAL PUBLICATIONS

1. "Irradiation and Halation", Traffic Engineering Magazine, December, 1968.
2. "Accuracy of Computer Program BMD02R, Stepwise Regression", Highway Planning Technical Report Number 17, Federal Highway Administration, Washington, D.C., April, 1970.
3. "A Simplified Procedure to Determine Factors for Converting Volume Counts to ADT's", Traffic Engineering Magazine, October, 1976.
4. "Annual Vehicle Miles Traveled per Family as a Function of Primary Wage Earner's Work Trip Mileage", Institute of Transportation Engineers Technical Notes, March, 1978.
5. "Another Look at Signalized Intersection Capacity", ITE Journal, August, 1978. This article was submitted in competition for the 1978 Institute of Transportation Engineers Past President Award and won the award. This is the most prestigious award granted by the Institute of Transportation Engineers to persons 35 years old or younger.
6. "Urban Development and Circulation Systems - A Critical Balance", ITE Compendium of Technical Papers, August, 1980.

PROFESSIONAL MEMBERSHIPS

1. Institute of Transportation Engineers - ITE (joined in 1967)
2. American Society of Civil Engineers - ASCE (joined in 1971)
3. Yale University Bureau of Highway Traffic Alumni Association (joined in 1972)
4. Forensic Consultants Association
5. Institute of Transportation Engineers Expert Witness Council
6. Orange County Traffic Engineering Council - OCTEC

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Table 1

SIGN COMPARISON DATA BASED ON 7 EXAMPLE OUTDOOR MEDIA SIGNS

Sign Type (1)	See Photo (2)	On a Cross Street	Corner of Intersection	Direction of Travel Sign Faces	Sign Size (excluding frame)	Location		
						Distance Behind Curb Face		Ground Level to Bottom of Sign in Inchs
						Inchs	Feet	
Outdoor Media (130) Bus Shelter	1a	Sunset @ Hayworth	northwest	westbound	67"H x 45"W	162	13.5	6
	1b	Sunset @ Hayworth	northeast	westbound	67"H x 45"W	57	4.8	10
Outdoor Media (131) Bus Shelter	2a	Olympic @ La Brea	southeast	eastbound	67"H x 45"W	308	25.7	18
	2b	La Brea @ Olympic	southeast	northbound	67"H x 45"W	61	5.1	12
Outdoor Media (144) Bus Shelter	3a	La Brea @ 3rd	southeast	northbound	67"H x 45"W	200	16.7	69
	3b	La Brea @ 3rd	southeast	northbound	67"H x 45"W	45	3.8	14
Outdoor Media (158) Bus Shelter	4a	Highland @ Sunset	northeast	northbound	67"H x 45"W	118	9.8	131
	4b	Highland @ Sunset	northwest	southbound	67"H x 45"W	82	6.8	16
Outdoor Media (160) Bus Shelter *	5a	Sunset @ Highland	northeast	westbound	67"H x 45"W	115	9.6	164
	4b	Highland @ Sunset	northwest	southbound	67"H x 45"W	82	6.8	16
Outdoor Media (167) Bus Shelter	6a	Rossmore @ Melrose	southwest	southbound	67"H x 45"W	118	9.8	9
	6b	Rossmore @ Melrose	southeast	northbound	67"H x 45"W	58	4.8	11
Outdoor Media (169) Bus Shelter *	7a	Rossmore @ Melrose	southwest	southbound	67"H x 45"W	600	50.0	10
	6b	Rossmore @ Melrose	southeast	northbound	67"H x 45"W	58	4.8	11
Outdoor Media Signs							9.6	
Minimum							50.0	
Maximum							19.3	
AVERAGE								
Bus Shelter Signs							3.8	
Minimum							6.8	
Maximum							5.3	
AVERAGE								
Ratio of Outdoor Media Sign / Bus Shelter Sign							2.6	
Minimum							7.3	
Maximum							3.7	
AVERAGE								
NOTES:								
(1) Outdoor Media Sign refers to a privately owned sign. The number after the words Outdoor Media refers to the sign's number. Paired with each Outdoor Media Sign is a nearby Bus Shelter Sign. The Bus Shelter Sign is the closest Bus Shelter Sign to the Outdoor Media Sign listed above it. In some cases the Bus Shelter Sign is the same for more than one Outdoor Media Signs. Where this occurs, the second listed Bus Shelter Sign has an * after the words Bus Shelter, and a previous photograph is referenced for its pairing partner.								
(2) Photographs were taken 100 feet back from the sign and in approximate location of driver's eye for car in right most travel lane. Photographs have a red dot above the sign.								
CONCLUSION: On average, Outdoor Media Signs are more than 3 times further away from the curb face than the Bus Shelter Signs. The AVERAGE Outdoor Media Sign is 19.3 feet from the curb face, while the AVERAGE Bus Shelter Sign is 5.3 feet from the curb face. All Bus Shelter Signs in sample are closer to curb face than all Outdoor Media Signs. The maximum Bus Shelter Sign is greater than the minimum Outdoor Media Sign. The Bus Shelter Signs are in the City owned right-of-way while the Outdoor Media Signs are outside of the City owned right-of-way. Outdoor Media Signs will always be further from the curb face for a given right-of-way width outside of the curb.								

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Table 2

ANGLE IN DEGREES THAT LEFT EDGE OF SIGN IS FROM
DRIVER'S EYE IF DRIVER IS LOOKING STRAIGHT AHEAD

Condition	Longitudinal Distance Driver Is Back from Sign						
	60 (Feet)	80 (Feet)	100 (Feet)	120 (Feet)	140 (Feet)	180 (Feet)	200 (Feet)
Driver's Eye Is Assumed to Be 15 Feet Left of Curb Face, and Lateral Distance to Sign from Curb Face Is:							
3.8 Feet (Minimum Found for Bus Shelter Signs)	17.4	13.2	10.6	8.9	7.6	6.0	5.4
4.0 Feet	17.6	13.4	10.8	9.0	7.7	6.0	5.4
5.0 Feet	18.4	14.0	11.3	9.5	8.1	6.3	5.7
5.3 Feet (AVERAGE Found for Bus Shelter Signs)	18.7	14.2	11.5	9.6	8.3	6.4	5.8
6.0 Feet	19.3	14.7	11.9	9.9	8.5	6.7	6.0
6.8 Feet (Maximum Found for Bus Shelter Signs)	20.0	15.2	12.3	10.3	8.9	6.9	6.2
7.0 Feet	20.1	15.4	12.4	10.4	8.9	7.0	6.3
8.0 Feet	21.0	16.0	13.0	10.9	9.3	7.3	6.6
9.0 Feet	21.8	16.7	13.5	11.3	9.7	7.6	6.8
9.6 Feet (Minimum Found for Outdoor Media Signs)	22.3	17.1	13.8	11.6	10.0	7.8	7.0
10.0 Feet	22.6	17.4	14.0	11.8	10.1	7.9	7.1
15.0 Feet	26.6	20.6	16.7	14.0	12.1	9.5	8.5
19.3 Feet (AVERAGE Found for Outdoor Media Signs)	29.8	23.2	18.9	16.0	13.8	10.8	9.7
20.0 Feet	30.3	23.6	19.3	16.3	14.0	11.0	9.9
25.0 Feet	33.7	26.6	21.8	18.4	15.9	12.5	11.3
30.0 Feet	36.9	29.4	24.2	20.6	17.8	14.0	12.7
40.0 Feet	42.5	34.5	28.8	24.6	21.4	17.0	15.4
50.0 Feet (Maximum Found for Outdoor Media Signs)	47.3	39.1	33.0	28.4	24.9	19.9	18.0
Is the AVERAGE Bus Shelter Sign within 15 Degrees of the Driver's Line of Sight When the Driver is Looking Straight Ahead? [See NOTE]	NO	YES	YES	YES	YES	YES	YES
Is the AVERAGE Outdoor Media Sign within 15 Degrees of the Driver's Line of Sight When the Driver is Looking Straight Ahead? [See NOTE]	NO	NO	NO	NO	YES	YES	YES
<p>NOTE: The 15 degrees is an angle chosen to represent the angle one might expect a driver to notice a sign. Clearly, a driver is more likely to see a sign if it is less than 15 degrees from his straight ahead line of sight, and less likely to see a sign if it is more than 15 degrees from his straight ahead line of sight. Whether 15 degrees or some other angle is used, similar results will be obtained.</p>							
<p>CONCLUSION: Bus Shelter Signs are more visible to a driver than Outdoor Media Signs, based on the angle off straight ahead that a driver has to look to see the sign. Bus Shelter Signs are more visible and logically more distracting, for the same size sign with the same message. Visibility is a function of the angle to the right of straight ahead that a driver has to look to see a sign. For the AVERAGE Bus Shelter Sign, it is within 15 degrees of a driver's straight ahead line of site at 80 or more feet back from the sign. For the AVERAGE Outdoor Media Sign, it is within 15 degrees of a driver's straight ahead line of site at 140 or more feet back from the sign. Outdoor Media Signs will always be further from the curb face and have a larger angle off straight ahead that a driver has to look to see the sign than a Bus Shelter Sign, for a given right-of-way width outside of the curb face.</p>							

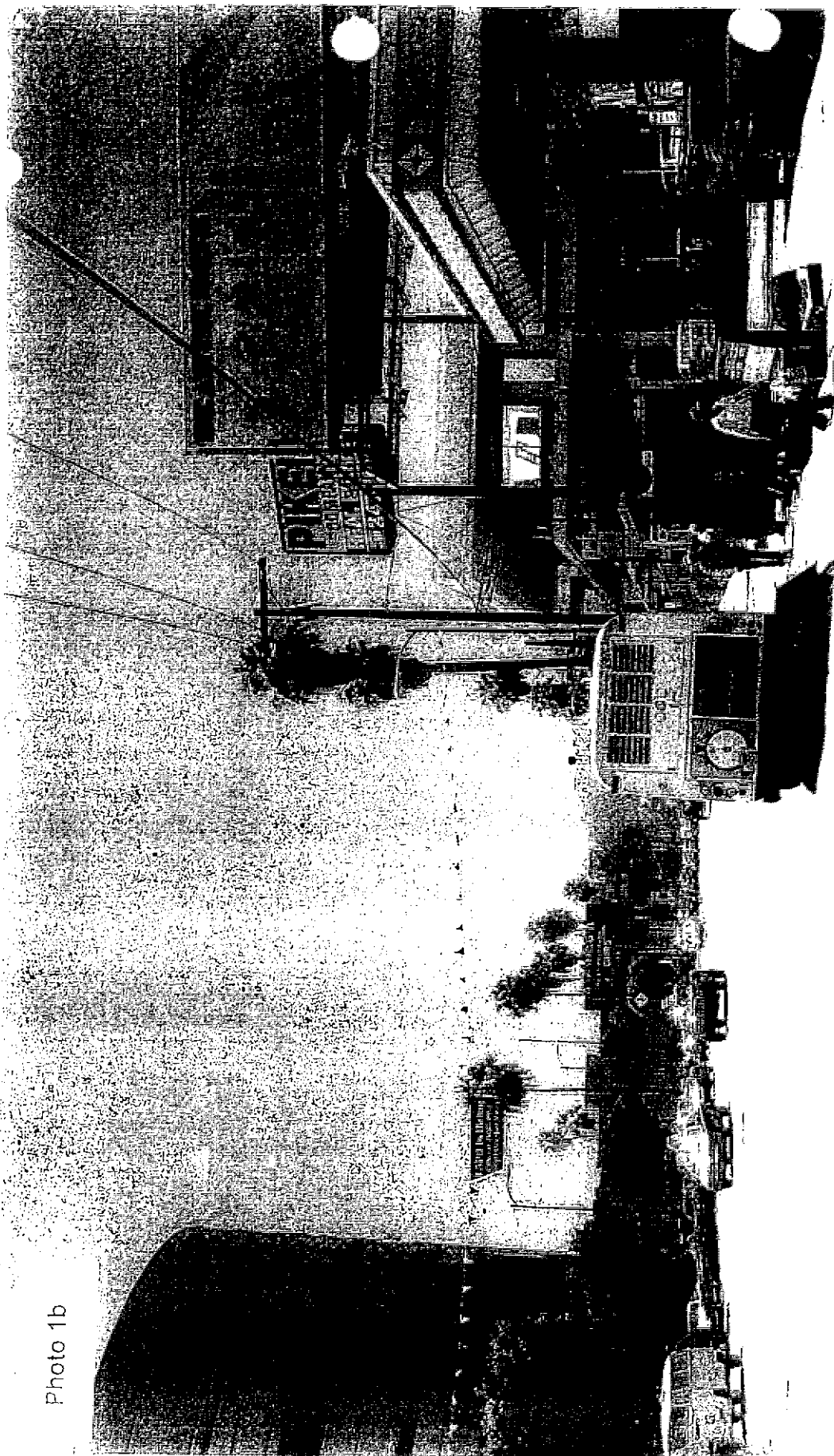


Photo 1b

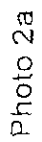




Photo 2b



Photo 3a

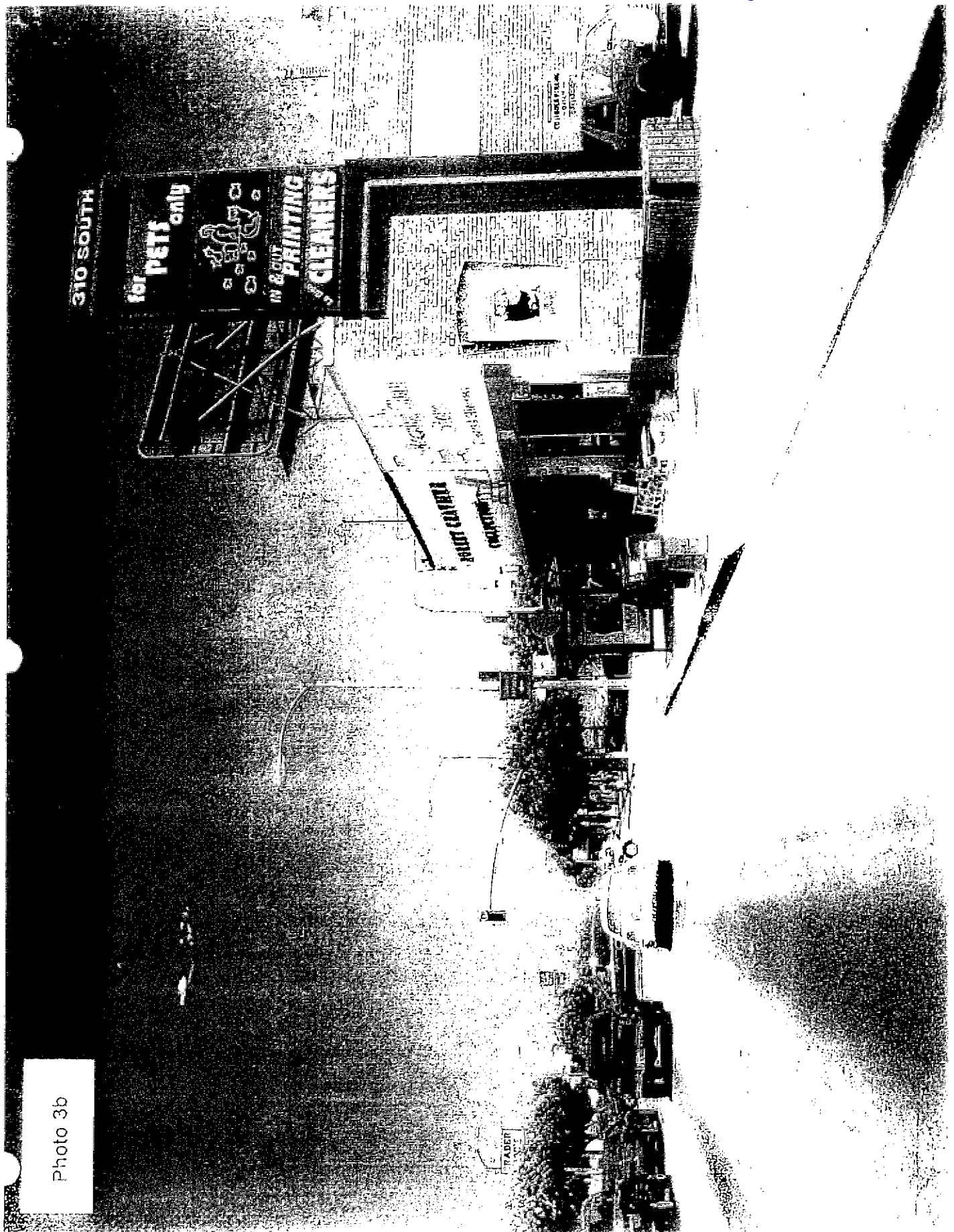


Photo 3b

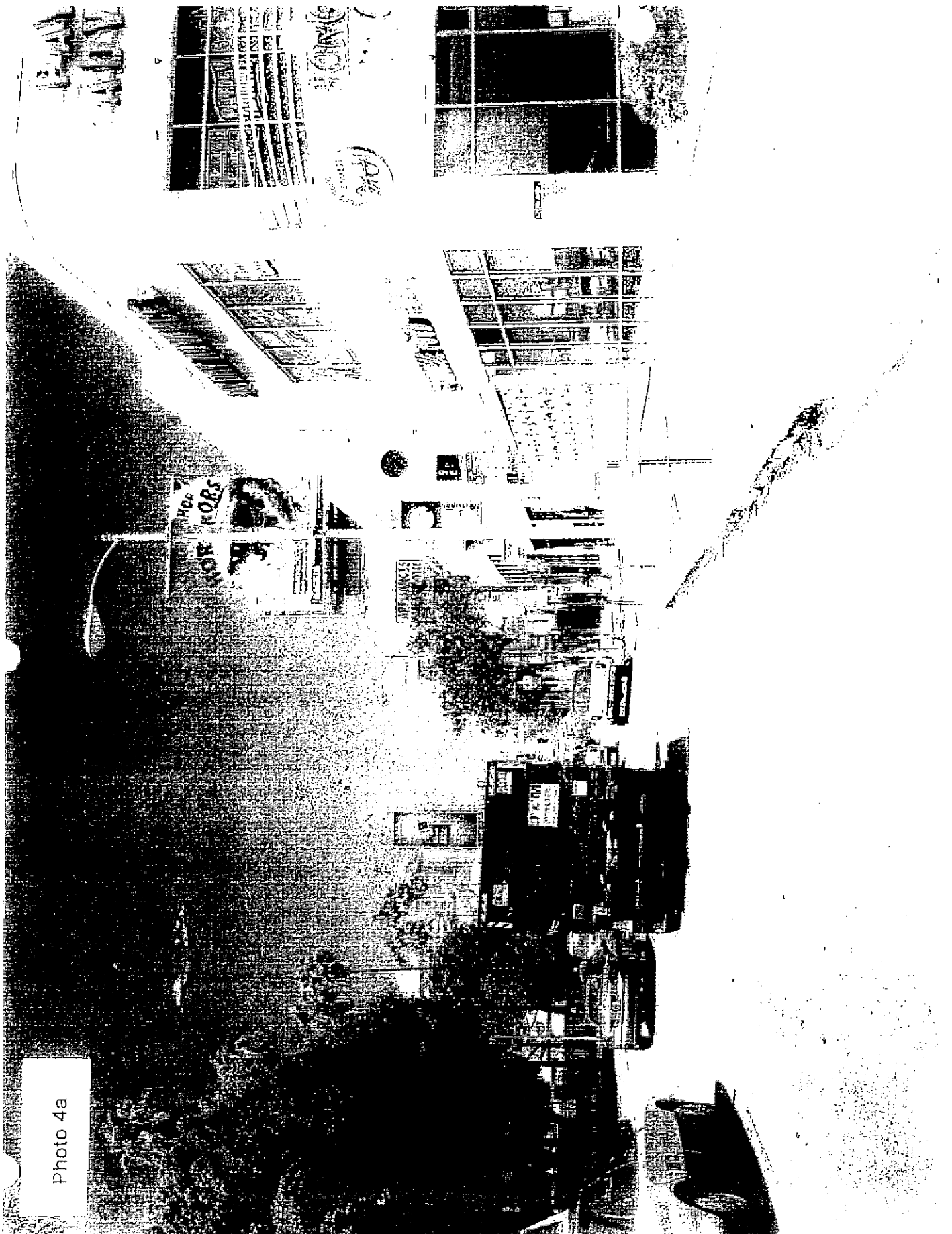


Photo 4a

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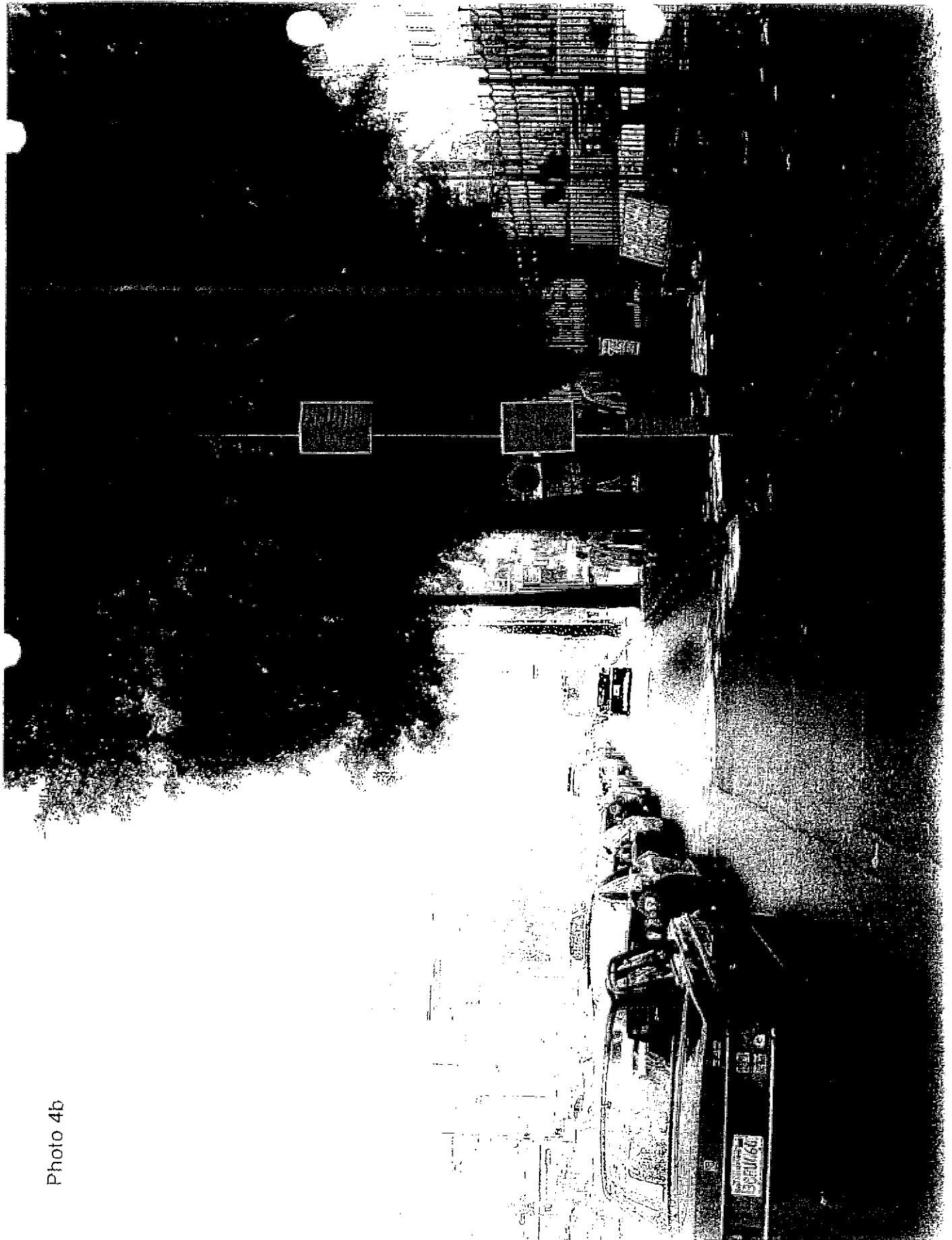


Photo 4b



Photo 5a

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The closest Bus Shelter Sign to the Outdoor Media Sign shown in Photo 5a is shown in Photo 4b.

Photo 6a

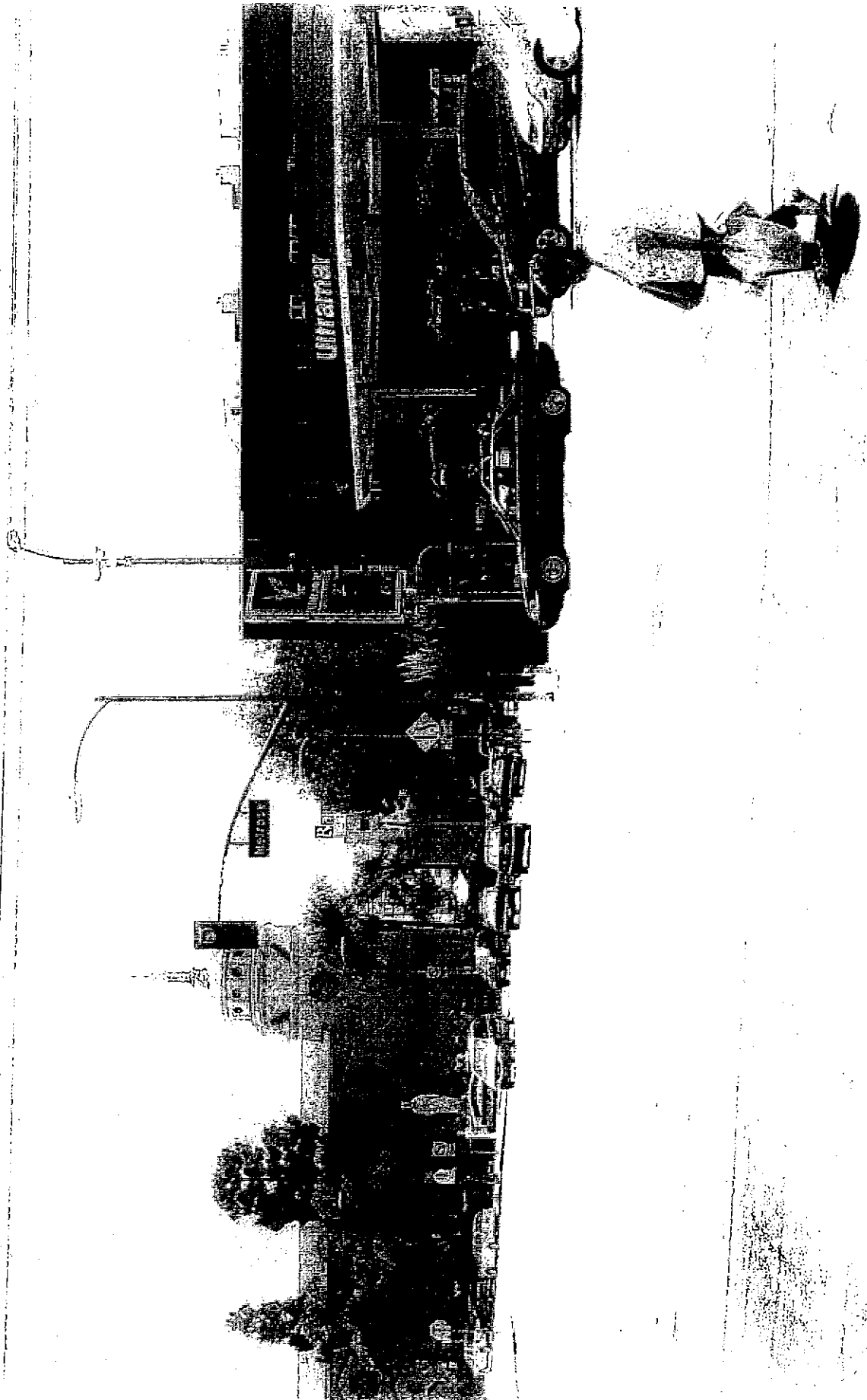




Photo 6b

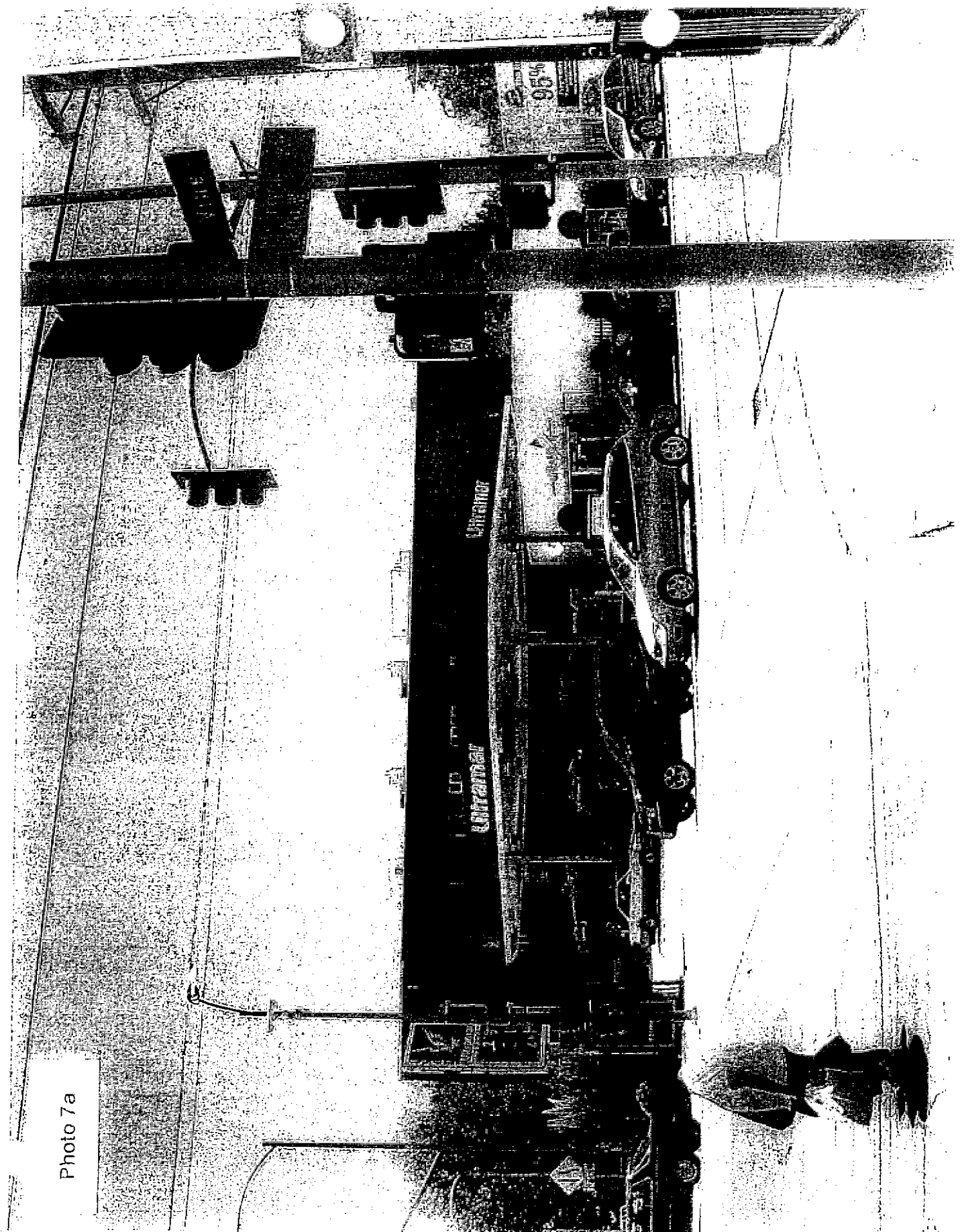


Photo 7a